



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 3 1987

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#6E3360 (RCB #1949). Permethrin on Collards, Turnip Greens, and Turnip Roots. Amendment dated 2/4/87. Record #190004.

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head *John H. Onley*
Tolerance Petition Section #2
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt Jamerson, PM#43
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

The petitioner, IR-4, has now submitted a second amendment to PP#6E3360. This amendment, consisting of a letter dated 2/4/87 and a revised Section B, is submitted in response to RCB's 4/16/86 review of PP#6E3360 and 11/13/86 review of an amendment dated 8/5/86.

The deficiency listed in the 11/13/86 review is outlined below, followed by the petitioner's response and RCB's discussion /conclusion.

Deficiency (#7 from the RCB review dated 11/13/86):

For the use of permethrin on turnips, RCB concludes that the residue data indicate that eight applications are feasible only in the states of Indiana and Texas. Notice that six applications in Florida yielded residues as high as 16.0 (15.5) ppm. Since residue data from California were not provided, the residue data base is somewhat scant for proper evaluation for a permanent tolerance. If the states of South Carolina, Georgia, Florida, and Washington stay on the proposed label, then only four applications (as was also approved for watercress in PP#4E3113) would be appropriate. In either case, a revised Section B/label should be submitted.

Petitioner's Response to the Deficiency

The petitioner submits a revised Section B/label (revised on 2/4/87) which indicates that up to 8 applications are to be made to turnips in the

states of IN and TX, and up to 4 applications are to be made to turnips in the states of SC, GA, FL, and WA.

RCB's Conclusion

The above deficiency is resolved by submission of the revised Section B/label.

Other Considerations

An International Residue Limit Status Sheet is attached to this review. No Codex limits or Mexican tolerances have been established on collards, turnip greens, and turnip roots. Therefore, there will not be any Codex-U.S. compatibility problem. A Canadian tolerance for permethrin on turnips at 0.1 ppm (negligible residue-type tolerance) is established.

Recommendations

TB and EAB considerations permitting, RCB recommends for establishment of the proposed permethrin tolerances of 20 ppm on collards and turnip greens, and 1 ppm on turnip roots.

If the proposed use is restricted to collards and turnips in certain locations, the proposed tolerances for permethrin on collards and turnips should be included in a separate subsection under 40 CFR 180.378 to avoid confusion regarding future 24(c) registrations and crop-grouping eligibility. The "tolerances with regional registration" would be referenced along with future regional registration tolerances in a new subsection (n) under 40 CFR 180.1 which would define the Agency's interpretation of "tolerances with regional registration." An appropriate interpretation for 40 CFR 180.1, subsection "n", would be:

Certain tolerances are based on geographically limited residue data. These "tolerances with regional registration" are included in separate subsections under 40 CFR 180.101 through 180.999. In order to expand the area of usage on these crops, additional residue data generated in these areas will be required. Persons seeking geographically broader registration on these crops should contact the appropriate EPA product manager concerning whether additional residue data are required.

Attachment 1: International Residue Limit Status sheet

cc: RF, Circu., Reviewer-N. Dodd, EEB, EAB, TOX, PM#43, PP#6E3360,
PP#4F3136, FDA, PMSD/ISB-Eldredge, F. Boyd-RCB
RDI:J.H.Onley:3/2/87:R.D.Schmitt:3/2/87
TS-769:RCB:CM#2:RM810:X1681:N.Dodd:N.Dodd:3/2/87

INTERNATIONAL RESIDUE LIMIT STATUSCHEMICAL permethrinCODEX NO. 120CODEX STATUS:☒ No Codex Proposal
Step 6 or above (on given
commodities)Residue (if Step 8): sum of
permethrin isomers

<u>Crop(s)</u>	<u>Limit</u> <u>(mg/kg)</u>
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PROPOSED U.S. TOLERANCES:Petition No. GE 3360RCB Reviewer N. DoddResidue: permethrin and its
metabolites DCVA and 3-PBA

<u>Crop(s)</u>	<u>Limit</u> <u>(mg/kg)</u>
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collards	20
turnip greens	20
turnip roots	1

CANADIAN LIMITS:☐ No Canadian limitResidue: permethrin isomers

<u>Crop(s)</u>	<u>Limit</u> <u>(mg/kg)</u>
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turnips	0.1 *
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MEXICAN LIMITS:☒ No Mexican limit

Residue: _____

<u>Crop(s)</u>	<u>Limit</u> <u>(mg/kg)</u>
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NOTES: *

negligible residue type limit